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June 25, 2020

Via Electronic Filing

The Honorable Magistrate Judge Robert M. Levy
U.S. District Court Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Oswaldo et al v. Kim et al*
Case No.: 1:18-cv-03140

Dear Honorable Judge Levy:

This law firm represents Plaintiffs Geferson Oswaldo and Jose Mayancela (together, the “**Plaintiffs**”) in the above-referenced action.

Pursuant to Your Honor’s Individual Motion Practice Rules 2(A) and 2(E), this letter respectfully serves to request an extension of time to file the Settlement Agreement and *Cheeks* Motion in the above-referenced matter from June 29, 2020 to, through and including, July 20, 2020.

This is the second request of its kind, and is made on consent of Defendants’ counsel. This request, if granted, would not affect any other scheduled deadlines.

The basis of this request is that the parties are still in the process of finalizing the language in the agreement and circulating it for signatures, a process that has been hampered by the ongoing and persistent COVID-19 pandemic.

In light of the foregoing, Plaintiffs request an extension of time to file the Settlement Agreement and *Cheeks* Motion in the above-referenced matter from June 29, 2020 to, through and including, July 20, 2020.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

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